

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION**

MDL No. 2724  
Civil Action No. 16-md-2724-CMR

HON. CYNTHIA M. RUGE

**THIS DOCUMENT RELATES TO:**

*State of Connecticut, et al., v. Teva  
Pharmaceuticals USA Inc., et al.*

Civil Action No.: 19-cv-2407-CMR

**DEFENDANT TRACY SULLIVAN DIVALERIO'S MOTION  
TO DISMISS THE AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Tracy Sullivan DiValerio respectfully moves this Court for an Order dismissing all claims against her in the above-captioned matter with prejudice. In support of her Motion, Ms. DiValerio submits the attached Memorandum of Law. Ms. DiValerio also joins in the three joint memoranda of law filed by Defendants on the grounds that (1) the States lack standing to bring their federal law claims, (2) the state law claims fail for a variety of reasons, and (3) the States have engaged in impermissible claim splitting.

Date: November 2, 2020

BY: /s/ Amy B. Carver  
Amy B. Carver, Esquire  
Welsh & Recker, P.C.  
306 Walnut Street  
Philadelphia, PA 19106  
(215) 972-6430  
abcarver@welshrecker.com

*Counsel for Tracy Sullivan DiValerio*